

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

D.T.E. No. 99-271

Comments of MCI WorldCom, Inc. Regarding KPMG's Exception No. 7

KPMG Exception No. 7: The quality of the results and frequent changes to the Bell Atlantic-Massachusetts standard Quality Baseline Validation Test Deck for the LSOG 2/3 release indicates that it has not undergone proper Bell Atlantic internal quality assurance testing and standards.

Domain: RMI

KPMG Assessment: The Quality Baseline Validation Test Deck results indicate that Bell Atlantic did not strictly adhere to its documented internal quality assurance procedures and testing. Given the success rate of test deck cases being validated, carriers do not have a large set of valid and functioning transactions to test their own systems with.

Revisions made to the Quality Baseline Validation Test Deck while the new release testing is in progress have not provided the CLECs with a stable environment.

The above mentioned points prevent the CLECs from carrying out full scale testing and has drastically reduced the window of time available for complet testing prior to the deployment of LSOG 2/LSOG 3 in a production environment.

All these factors may significantly affect a CLEC's ability to test EDI interface software effectively, consume CLEC resources unnecessarily, and ultimately prevent, hinder, and/or delay a CLEC's ability to conduct business with Bell Atlantic-Massachusetts over an EDI medium.

Date of Exception: February 29, 2000

Date of BA Response: March 7, 2000

Date of MCI WorldCom
Comments: March 20, 2000

MCI WorldCom Comments:

Exception No. 7 identifies a specific instance of BA failing to follow its own rules. More importantly, however, the Exception identifies a problem which, if left unremedied, could severely damage the ability of CLECs to conduct business in Massachusetts.

The specific instance identified by KPMG involves BA's failure to give CLECs adequate time to adjust to BA's repeatedly revised Quality Baseline Validation Test Deck in connection with LSOG 2/3 testing. MCI WorldCom agrees with KPMG's assessment that BA's failure to adhere to its documented quality assurance procedures could "ultimately prevent, hinder, and/or delay a CLEC's ability to conduct business with Bell Atlantic-Massachusetts over an EDI medium." KPMG Exception #7 Report at 2.

In its response, BA tries to downplay the significance of its shortcomings by stating that it "is not aware of any adverse affects to CLECs involved in the testing process." That misses the point entirely. The CLEC Testing Environment was created to allow CLECs to test their systems in a stable environment. By failing to resolve its own quality assurance issues before the release of the test deck, BA failed to give CLECs that stability. When BA introduces new variables into the test environment, CLECs have no way of knowing whether subsequent errors are due to flaws with the CLEC's software or with the test deck itself. This results in the need for additional testing by CLECs, which, as noted by KPMG, "consume(s) CLEC resources unnecessarily." Yet BA's response seems to suggest that failing to follow its own rules is acceptable so long as it can be shown retrospectively that it avoided inflicting "adverse effects" on CLECs.

BA's failure with respect to LSOG 2/3 testing exposes a fundamental problem that must be addressed; there is a pressing need to establish performance standards that compel BA to properly implement its QA procedures, and thus give CLECs the environment and time they need to test their systems. Without standards (or more accurately, without standards linked with consequences that will have a behavior-modifying effect) BA has little incentive to follow its internal quality assurance procedures. And the effect on CLECs could be devastating. By not following software validation testing standards or change control agreements, an ILEC could effectively shut a CLEC down by failing to give the CLEC time to adjust to new system software. To remedy this problem, MCI WorldCom recommends that the Department adopt modified versions of the appropriate New York metrics regarding change management timeliness, software error correction, software validation, etc. Performance metrics, when coupled with the spectre of serious financial consequences, are the surest way to prompt BA to consistently and correctly providing CLECs with a suitable testing environment.